



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

April 18, 2003

RE: FCC ID: O34-E790GPRS

Attention: Tri M. Luu

I have a few comments on this Application.

1. Please note that you have placed "This device contains a WAVECOM RF Modem Model No. INTEGRA M2113A which was approved by FCC (FCC ID: O9EM2113)" on the FCC ID label. By placing this statement on the label, this indicates that you have accepted and agree to the use permit associated with that grant. Please note that the OEM installation manual for the FCC ID:O9EM2113 specifically states that portable use is prohibited. Your SAR report tests the device for Body SAR indicating that an intent of your product is portable use. Your test report classifies the device as "Portable." The SAR report does not provide any information on any accessory that would allow the device to be used in a portable configuration (i.e. no information on shoulder straps, belt clips etc). Also, your manual has no indication of portable use. Please thoroughly explain why the grant conditions on the rf modem internal to your device has been violated and please explain how this device is used in a portable configuration (i.e. what straps, belt clips etc are used). If this is a portable device, please remove the "Contains TX" statement so as not to violate the grant conditions associated with the internal rf modem. If this device is not for use in a portable configuration, please clearly state this and correct all documentation. If this device is not used in a portable configuration then an MPE report not a SAR report is needed. Please clarify, identify and correct all documentation to match the correct classification of this device.
2. Please note that your manual contains no RF exposure information as required. Please note that the end user is required to be informed about rf hazards for either portable or mobile devices. If portable, then the rf statement in the user manual must clearly state compliance to SAR requirements; if mobile the user manual must clearly state 20cm separation requirements. Also please note that the OEM installation manual does not appear to be the document provided to the end user and as such the rf statement in that manual is not valid to meet the rf notification requirements to the user. Please provide a proper rf exposure statement in the end user manual that is associated with the proper and defined use of this device.
3. Please provide proper probe calibration data. The information provided appears to be more of a calibration method than calibration data. Probes must show calibration data within 100MHz of the target frequencies. Please provide the appropriate calibration certificate and data for the probe.
4. No apparent dipole calibration data was provided. Please provide the dipole calibration data.
5. Please clarify the crest factor on the data sheets/plots for the device under test. Perhaps I have overlooked or missed this item.
6. Please note that the device is classified as a base station (PCB). As such, the power listed on the grant must be conducted power. Your report states that the 'specification' is 712mw, and it says the 712mW was measured, but you have provided no evidence of this measurement in the report (i.e. you have not defined how you tested conducted power nor the test method used to measure conducted power). Please provide objective evidence of the antenna conducted power measurements and methods for this base station (PCB) transmitter.
7. Please note that this device operates at 1850.2 and 1909.8MHz. However, your report shows that the lowest and highest frequencies were not tested. Thus you have not shown compliance to band and block edges. It is therefore not known if this device complies with band edge requirements. Please provide plots/data showing compliance with the band edges as required in 24.238(a) and (b).
- 8.

A handwritten signature in cursive script that reads "Dennis Ward".

Dennis Ward
<mailto:dward@AmericanTCB.com>

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.